

1 Christopher R. LeClerc, Esq. (SB# 233479)  
2 **LE CLERC & LE CLERC LLP**  
3 155 Montgomery Street, Suite 1004  
4 San Francisco, CA 94104  
5 Telephone: (415) 445-0900  
6 Fax: (415) 445-9977  
7 Email: chris@leclerclaw.com

8  
9 Attorneys for Plaintiff CHANDANI DEZURE

10 **LEWIS BRISBOIS BISGAARD & SMITH LLP**

11 JESSICA STUART PLINER, SB# 261976  
12 Email: [Jessica.Pliner@lewisbrisbois.com](mailto:Jessica.Pliner@lewisbrisbois.com)  
13 MARA A. SACKMAN, SBN# 330490  
14 Email: [Mara.Sackman@lewisbrisbois.com](mailto:Mara.Sackman@lewisbrisbois.com)  
15 2185 North California Boulevard, Suite 300  
16 Walnut Creek, California 94596  
17 Telephone: 925.357.3456  
18 Facsimile: 925.478.3260

19 **MITCHELL BARLOW & MANSFIELD, P.C.**

20 CHRISTOPHER SULLIVAN (*Admitted Pro Hac Vice*)  
21 Email: [Csullivan@mbmlawyers.com](mailto:Csullivan@mbmlawyers.com)  
22 KADEX OLSEN (*Admitted Pro Hac Vice*)  
23 Email: [KOlsen@mbmlawyers.com](mailto:KOlsen@mbmlawyers.com)  
24 9 Exchange Place  
25 Salt Lake City, Utah 84102  
26 Telephone: (801) 998-8888  
27 Facsimile: (801) 998-8077

28 Attorneys for Defendant THE AMERICAN BOARD OF PEDIATRICS, INC.

19  
20 **UNITED STATES DISTRICT COURT**  
21  
22 **NORTHERN DISTRICT OF CALIFORNIA**  
23  
24 **[SAN JOSE DIVISION]**

25 CHANDANI DEZURE, an individual, ) Case No. 5:20-cv-09123  
26 )  
27 Plaintiff, ) **STIPULATION TO DISMISS ACTION**  
28 ) **WITHOUT PREJUDICE**  
v. )  
THE AMERICAN BOARD OF )  
PEDIATRICS; and DOES 1-50, inclusive, )  
Defendants. )

## Recitals

*Whereas*, the parties to this action have reached an agreement to resolve this matter, the terms of which are confidential;

*Whereas*, the parties wish to dismiss this action without prejudice as a result of, and subject to, the terms of the confidential agreement reached by and between the parties;

*Whereas*, the parties request the Court retain jurisdiction to enter a dismissal with prejudice at a later date in the event that future events occur, the occurrence of which is not presently certain.

### *Stipulation*

Pursuant to Rule 41(a)(1)(A)(ii), IT IS HEREBY STIPULATED by all parties that have appeared in this action that this lawsuit be dismissed *without prejudice* as to all parties and all causes of action, with each side to bear its own fees and costs.

The Parties further stipulate that the Court retain jurisdiction to enter a dismissal with prejudice in the future if events, presently uncertain to occur, occur and the parties file such a request.

DATED: March 31, 2022

## MITCHELL BARLOW & MANSFIELD, P.C.

By. /s/

---

CHRIS SULLIVAN  
Attorneys for Defendant  
THE AMERICAN BOARD OF PEDIATRICS, INC.

DATED: March 31, 2022

# LEWIS BRISBOIS BISGAARD & SMITH LLP

By: /s/

---

JESSICA S. PLINER  
Attorneys for Defendant  
THE AMERICAN BOARD OF PEDIATRICS, INC.

1 DATED: March 31, 2022

LeCLERC & LeCLERC LLP

2 By: 

3  
4 Christopher R. LeClerc  
5 Attorneys for Plaintiff  
6 CHANDANI DeZURE

7 **SIGNATURE ATTESTATION**

8 Pursuant to Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this  
9 document has been obtained from the other signatories.

10 DATED: March 31, 2022

LeCLERC & LeCLERC LLP

11 By: /s/

12 Christopher R. LeClerc  
13 Attorneys for Plaintiff  
14 CHANDANI DeZURE

15 PURSUANT TO STIPULATION, IT IS SO ORDERED,

16  
17 Date: March 31, 2022

